

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S
APPEARANCE AT THE JUNE 16-17, 2021 OMNIBUS HEARING**

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures for June 16-17, 2021, Omnibus Hearing* (the "Scheduling Order") (Dkt. No. 16898):

1. Attorney Arturo J. García-Solá and/or Nayuan Zouairabani of McConnell Valdés, LLC will appear on behalf of AmeriNat at the June 16-17, 2021 Omnibus Hearing (the "Omnibus Hearing"), which will be conducted telephonically via CourtSolutions.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Mr. García-Solá and/or Zouairabani may present oral argument related to the following pleadings:

- a. *Official Committee of Unsecured Creditors' Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF* (Dkt. No. 16812);
- b. *Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company to Compel Discovery from the Government Parties in Connection with the Disclosure Statement* (Dkt. No. 16812);
- c. *Joint Informative Motion of Ambac Assurance Corporation, Financial Guaranty Insurance Company, the Official Committee of Unsecured Creditors, the Financial Oversight and Management Board for Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority with Respect to (I) the Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company to Compel Discovery from the Government Parties in Connection with the Disclosure Statement, and (II) the Official Committee of Unsecured Creditors' Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF* (Dkt. No. 16813);
- d. *Motion for Joiner of Official Committee of Unsecured Creditors and Ambac Insurance Corporation's Motion for Discovery as to the Disclosure Statement* (Dkt. No. 16841);
- e. *AAFAF's Omnibus Opposition to the Official Committee of Unsecured Creditors', Ambac Assurance Corporation's, and Financial Guaranty*

Insurance Company's Motions to Compel Disclosure Statement Discovery
(Dkt. No. 16878);

- f. *Reservation of Rights of Assured Guaranty Corp., Assured Guaranty Municipal Corp., and National Public Finance Guarantee Corporation with Respect to (1) the Official Committee of Unsecured Creditors Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF (ECF No. 16811) and (2) the Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company to Compel Discovery from the Government Parties in Connection with the Disclosure Statement (ECF No. 16812) (Dkt. No. 16879);*
- g. *Amended Joinder of the DRA Parties to (I) Official Committee of Unsecured Creditors Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF and (II) Urgent Motion of Ambac Assurance Corporation And Financial Guaranty Insurance Company to Compel Discovery from the Government Parties in Connection with the Disclosure Statement (Dkt. No. 16881);*
- h. *Objection of the Financial Oversight and Management Board for Puerto Rico to Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company to Compel Discovery in Connection with the Disclosure Statement (Dkt. No. 16882);*
- i. *Objection of the Financial Oversight and Management Board for Puerto Rico to Urgent Motion of the Official Committee of Unsecured Creditors to Compel*

Discovery in Connection with the Third Amended Disclosure Statement (Dkt. No. 16883);

- j. *Joinder of Group Creditors Holding Government Employees Wage Claims to (I) Official Committee of Unsecured Creditors' Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF, and (II) Urgent Motion of Ambac Assurance Corporation and Financial Guaranty Insurance Company (ILL) Amerinational Community Services, LLC (The "Servicer"), as Servicer for the Gob Debt Recovery Authority (the "Ora"), to Compel Discovery from the Government Parties in Connection with the Disclosure Statement (Dkt. No. 16896);*
- k. *Reply of Ambac Assurance Corporation and Financial Guaranty Insurance Company in Further Support of Urgent Motion to Compel Discovery from the Government Parties in Connection with the Disclosure Statement (Dkt. No. 16905);*
- l. *Official Committee of Unsecured Creditors Reply in Support of Urgent Motion to Compel Disclosure Statement Discovery from Oversight Board and AAFAF (Dkt. No. 16906); and*

m. Any other responses or motions related to the foregoing.

3. AmeriNat further reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board by June 14, 2021, or to address any statement or issue that may be raised by any party at the Omnibus Hearing related to the Title III cases or adversary proceeding which may affect the interests of the DRA. AmeriNat also reserves the right to amend this motion as needed.

WHEREFORE, AmeriNat respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of June, 2021.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Fourteenth Amended Notice, Case Management and Administrative Procedures Order* [Dkt. No. 15894-1] (the "CMP Order"), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

*Attorneys for AmeriNational Community Services,
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Authority*

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